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UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW YORK

FEDERAL INSURANCE COMPANY, INC.,

Civil Action No. 09-CV-7863

Plaintiff,

(NRB) (ECF CASE)

Hon, Naomi Reice Buchwald

vs.

SAFENET, INC., CAROLE ARGO, and ANTHONY CAPUTO,

Defendant.

STIPULATION RE: ENTRY OF JUDGMENT AND DISMISSAL OF COUNTERCLAIMS WITH PREJUDICE

Plaintiff and Counter-defendant, Federal Insurance Company ("Federal"), and Defendants and Counterclaimants, SafeNet, Inc. ("SafeNet"), Carole Argo, and Anthony Caputo, do hereby stipulate, covenant, and agree, subject to the approval and order of this Honorable Court:

- (1) that JUDGMENT (in the form attached hereto as Exhibit "A") be entered in this action for Federal in accordance with the Court's September 9, 2011 Memorandum and Order on the parties' cross-motions for summary judgment;
- (2) that the Counterclaims of SafeNet, Carole Argo, and Anthony Caputo against Federal be dismissed with prejudice; and
- (3) that none of SafeNet, nor Carole Argo, nor Anthony Caputo will appeal the JUDGMENT, or bring or maintain any further claim against Federal with respect to the Class Action, the First Excess Policy, or any other matter that was raised or could have been raised in

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Counsel for SafeNet	Counsel for Anthony Caputo
By:	Anthony Caputo
SafeNet, Inc.	

SO OKDÉRED.

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By: SafeNet, Inc.	Anthony Caputo

SO ORDERED.

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Counsel for SafeNet	Counsel for Anthony Caputo
Ву:	Anthony Caputo
SafeNet, Inc.	

SO ORDERED.

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SO ORDERED.

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	Counsel for SafeNet	
		Total Control
- 1	D	Anthony Caputo
	By:	
I.	SafeNet, Inc.	

SO ORDERED.

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October 24, 2011

/s/ Michael F. Perlis Isl Matthew B. Holmwood Michael F. Perlis Matthew B. Holmwood Locke Lord Bissell & Liddell LLP Wilmer Cutler Pickering Hale & Dorr 300 S. Grand Avenue, Suite 2600 1875 Pennsylvania Avenue, NW Los Angeles, CA 90071 Washington, DC 20006 Counsel for Carole Argo Counsel for Federal James M. Carson Carole Argo Federal Insurance Company /s/ John A. Freedman /s/ Duane Sigelko John A. Freedman Duane Sigelko Arnold & Porter, LLP Reed Smith LLP 555 Twelfth Street, N.W. 10 South Wacker Drive Washington, DC 20004 Chicago, IL 60606-7507 Counsel for Anthony Caputo Counsel for Spfellet Anthony Caputo

SO ORDERED.

SafeNet, Inc.

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NAOMI REICE BUCHWALD UNITED STATES DISTRICT JUDGE

By: Kenneth M. Siegel, 8VP & GC

SO STIPULATED:

October 24, 2011

Is/ Michael F. Perlis	/s/ Matthew B. Holmwood
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· · · · ·	
	Anthony Caputo
Ву:	
SafeNet, Inc.	

SO ORDERED.

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Rederal's Complaint in this action, and/or the Counterclaims of SafeNet, Carole Argo, and/or Anthony Caputo, and that Federal will not appeal the JUDGMENT, or bring or maintain any further claim against SafeNet or Carole Argo or Anthony Caputo with respect to the Class Action, the First Excess Policy, or any other matter that was raised or could have been raised in Federal's Complaint in this action, and/or the Counterclaims of SafeNet, Carole Argo, and/or Anthony Caputo.

SO STIPULATED:

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Is Michael F. Perlis <u>|s| Matthew B. Holmwood</u> Michael F. Perlis Matthew B. Holmwood Locke Lord Bissell & Liddell LLP Wilmer Cutler Pickering Hale & Dorr 300 S. Grand Avenue, Sulte 2600 1875 Pennsylvania Avonue, NW Washington, DC 20006 Los Angeles, CA 90071 Counsel for Federal Counsel for Carole Argo James M. Carson Carole Argo **Federal Insurance Company** Ist John A. Freedman Isl Duane Sigelko John A. Freedman Duane Sigelko Arnold & Porter, LLP Reed Smith LLP 555 Twelfth Street, N.W. 10 South Wacker Drive Washington, DC 20004 Chicago, IL 60606-7507 Counsel for Anthony Caputo Counsel for SafeNet Anthony Caputo SafeNet, Inc.

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